BELLSOUTH

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January 21, 1998

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
1919 M Street, NW, Room 222
Washington, D.C. 20554

Re: Written Ex Parte in:
CC Docket No. 97-208, CC Docket No. 97-231,
CC Docket No. 97-124/CC Docket No. 97-137,
And CC Docket No. 96-98

Dear Ms. Salas:

This is to inform you that BellSouth Corporation has responded today in a written ex parte to questions posed at a recent meeting of Common Carrier Bureau staff and representatives of BellSouth Corporation. That ex parte meeting, for which notice was filed with you on January 15, 1998, was in the above referenced proceedings.

Pursuant to Section 1.1206(a)(1) of the Commission's rules, we are filing in each of the proceedings listed above two copies of this notice and that written ex parte presentation. Please associate this notification with the above-referenced proceedings.

Sincerely,

Kathleen B. Levitz

Kathleen B. Levitz
Vice-President
Federal Regulatory Affairs

Attachment

cc: Carol Mattey

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January 21, 1998

EX PARTE OR LATE FILED

Ms. Carol Mattey
Acting Chief
Policy and Program Planning Division
Common Carrier Bureau
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Written Ex Parte in CC Docket No. 97-208, CC Docket No. 97-231, CC Docket No. 97-124, CC Docket No. 97-137 and CC Docket No. 96-98

Dear Ms. Mattey:

On Wednesday, January 14,1998, representatives of BellSouth met with you and your staff to discuss issues relating to the Section 271 checklist requirements. At that time your staff asked the BellSouth representatives for additional information on issues relating to: (1) BellSouth's provision of access to its databases and associated signaling, operator services, and white pages directory listings; and (2) the company's provision of unbundled local switching, unbundled local loops; and unbundled transport. The staff also posed questions relating to BellSouth's collocation offerings and its efforts to comply with the Commission's local number portability requirements.

We have gathered the information that we believe is most responsive to your staff's requests. That information is attached. If after reviewing this attachment your staff concludes that it needs additional or different information related to these topics, please call me at (202) 463-4113.

In compliance with Section 1.1206(a)(1) of the Commission's rules, we have today filed with the Secretary of the Commission two copies of this written ex parte presentation in each of the proceedings listed above and requested that it be associated with each of those proceedings.

Sincerely,

Kathleen B Levitz

Kathleen B. Levitz
Vice President
Federal Regulatory Affairs

RESPONSES TO QUESTIONS RAISED AT 1/14/98 MEETING WITH FCC

SIGNALING

Q. Provide disaggregated data to show # of database dips by CLECs that are interconnected vs. # for CLECs using resale.

A. During 1997, 1.638 million database queries were made from NPA-NXX codes assigned to CLECs. BellSouth does not distinguish between its end-users and the end-users of a CLEC that is a reseller. BellSouth, therefore, does not know the number of call related database queries made to BellSouth's databases from the end user customers of CLECs on a resale basis since no distinction is made by the BellSouth switch, Signal Transfer Point as to whether a given query is from a BellSouth end user customer or a CLEC's end user customer. In this way, complete parity of access to BellSouth's call related databases is assured.

Through November 1997, CLECs and other parties (that is, parties other than BellSouth) made a total of 65.5 million queries of BellSouth's 800 database. During that same time, CLECs and other parties (that is, parties other than BellSouth) made a total of 408.7 million queries of BellSouth's Line Information Database (LIDB).

Q. How many CLECs are interconnected for signaling?

A. As of December 1, 1997, there were no CLECs connected directly to BellSouth's signaling network. There were, however, as of that same date a total of ten (10) CLECs accessing BellSouth's signaling network through a third party "signaling hub" provider which was directly connected to BellSouth's signaling network. Also as of that same date, an additional six (6) CLECs were connected to BellSouth's signaling network through an interexchange carrier which was directly connected to BellSouth's signaling network.

WHITE PAGES

Q. How many CLEC listings do we have?

A. According to BellSouth Advertising and Publishing Company (BAPCO), there are 193,167 CLEC customer listings in the white pages.

There are 140,773 CLEC listings in BellSouth's directory assistance databases.

OPERATOR SERVICES

Q. Provide line class code capacity by switch type.

A. The current capacity for Line Class Codes (or their equivalents) for each switch type in BellSouth's network is as shown below:

- Lucent Technologies 1AESS 1024*
- Lucent Technologies 5ESS 4096

• Nortel DMS-100 and DMS-100/200	2024
• Nortel DMS-10	512
• Siemens Stromberg Carlson DCO	512
• Siemens EWSD	4096

* Expected to be increased to 2048 during 2Q98.

Q. Provide, by state, for each switch type line class code capacity.

A. This information is shown in the answer to the previous question. BellSouth negotiates region-wide agreements for switch "generic" program upgrades. A "generic" program is a standard set of operating system and application software for a given switch type. Manufacturers regularly update their generics and make these available to the purchasers of their switching systems. The LCC capacity is one the many factors controlled by the generic program installed on a given switch. BellSouth's policy is to have most or all of its switches operating under the same generic program release at a given time.

BellSouth prepared a study of the impact on LCC capacity of CLEC use of selective routing using the LCC method. The results of this study were used during arbitration proceedings between BellSouth and certain CLECs. The study parameters include the following:

1. Counts of LCCs in service were taken during July and August 1995. No growth of LCCs in service was assumed except for completion of deployment of the Call Authorization Management[SM] (CAM) capability. As a result, true case will be worse than as calculated and depicted without the inclusion of growth for LCCs used.

2. LCC capacities for specific switch types were set at the maximum known capability. These maximum levels are the greater of currently installed capacities or, as in the case of the Nortel DMS-100, announced LCC capacity levels.

3. The measurement mechanism used could not count LCCs actually in service above the level of 1000 due to a restriction of the register size. This situation is limited to the case of the Lucent Technologies 5ESS switches.

The results of BellSouth's earlier study are included as Attachment 1 and show the portion of BellSouth's switches in a given state that LCC capacity will be exhausted with a specified quantity of CLECs (one, three, five or eight CLECs) with selective routing using the LCC method. Because this earlier study required about one month to complete, time did not allow an update of the study for purposes of this response. However, to date, only AT&T is using selective routing in only one state (Georgia) of BellSouth's nine state region. As a result of this limited deployment of selective routing, no exhaust of LCC capacity has occurred.

Q. Describe competitive effect on CLECs of line class code capacity exhaust.

A. LCCs are used for a variety of purposes including the creation of new local serving areas and new services. Since, at any given time, there is a finite quantity of LCCs installed in a given switch, it is possible that the total demand for services and features which rely on LCCs to determine the appropriate call treatment, might exceed the available supply. One such use of LCC capacity is the provision of selective routing, which has also been referred to as customized routing. In the case of selective routing using the LCC method, such an exhaust could result in certain CLECs having the selective routing functionality while other CLECs, that is, those CLECs which requested the selective routing functionality after the available LCC capacity had been exhausted, would not be able to have the selective routing functionality at all. Thus, in such a case, the customers of certain CLECs (that is, those with the selective routing functionality) would have their calls routed to the operator service or directory assistance platform chosen by the CLEC. The customers of certain other CLECs (that is, those without the selective routing functionality) would have their calls routed to the operator service or directory assistance platform of the incumbent local exchange carrier. The exhaust of LCC capacity would also result in BellSouth's not being able to introduce certain new products, services or dialing patterns where access and use of such would rely on LCCs to determine the appropriate treatment. This will affect both BellSouth's end user customers and those of any CLECs served by a BellSouth's switch which had exhausted its LCC capacity.

Further, the exhaust of LCCs would preclude the possibility, in some cases, of adding remote switches to an existing host switch. In such a case, significant extra cost would be incurred by BellSouth to deploy a stand-alone or host switch when a simple remote switch could be provisioned. Also, some existing host/remote arrangements would have to be modified such that the remote switches would need to be upgraded to host switches, again with considerable expense to BellSouth.

Q. Provide a schedule by state for roll-out of BellSouth's Advanced Intelligent Network (AIN) selective routing solution. Selective routing has also been referred to as customized routing.

A. BellSouth at this time has not developed a roll-out schedule for its AIN selective routing capability. Development work is complete for the AIN selective method and a technical trial of this method is in progress in Georgia. If testing is successful, general deployment will begin in Louisiana before the end of 1998, in conjunction with the Louisiana PSC's requirements. Deployment in other states will be dependent on test results and will be based on demand.

SWITCHING

Q. How many CLECs have requested local tandem interconnection?

A. To date, four CLECs have requested interconnection at BellSouth's local tandems. These CLECs are MCImetro, NextLink, Hyperion and ICG. BellSouth

has provided local tandem interconnection to Hyperion (144 trunks) and ICG (96 trunks) at BellSouth's Armory Place local tandem in Louisville, Kentucky. BellSouth is still working out details with MCImetro and NextLink as to how and where these CLECs will interconnect with BellSouth's local tandems.

The CLECs will now have access to the BellSouth local tandems for exchange of local traffic with BellSouth offices. This option applies only to local traffic between the CLEC and BellSouth offices. By interconnecting to the local tandem, the CLEC will have access to all BellSouth end offices in the local calling area.

All transient local traffic (CLEC to CLEC or CLEC to Independent Company or other Regional Bell Operating Company) must be exchanged at the access tandem on the CLEC's transient trunk group. CLEC to Wireless Carrier traffic must be exchanged at the access tandem on the trunk group(s) carrying local/intraLATA toll traffic.

The CLEC will still be required to interconnect at the access tandems where the CLEC's NPA-NXXs home for exchange of intraLATA toll and all transient traffic.

The CLEC may interconnect to one or more local tandems in a local calling area when multiple local tandems exist. The CLEC is not required to connect to all local tandems in a local calling area. If the CLEC connects to more than one local tandem in the local calling area, a "home" local tandem must be designated by the CLEC for its NPA-NXXs. The CLEC trunk group to its home local tandem will be a "final" trunk group.

The CLEC may order a one-way trunk group or a two-way trunk group to the local tandem. The two-way trunking principles discussed later will apply if two-way trunking is ordered. Also, for two-way trunking to the local tandem, the CLEC must provide a Carrier Identification Code (CIC) that is not used for FG-D service. If one-way local tandem trunking is ordered, the Feature Group D CIC is adequate.

BellSouth may deliver local traffic to the CLEC from the local tandem. A trunk group from BellSouth to the CLEC is still required for delivery of intraLATA toll traffic from the access tandem that the CLEC's NPA-NXXs home on.

Q. With respect to local tandem interconnection, is the Bona Fide Request (BFR) process necessary? Why? How does it work? Any successful stories? Provide data on how long it takes.

A. With respect to local tandem interconnection, although BellSouth initially took the position that a BFR would be necessary, that is no longer true. BellSouth now offers local tandem interconnection as a standard arrangement, and has attempted to clarify that position in the filing of its Statement of Generally Available Terms and Conditions in Tennessee. As stated above, BellSouth offers local tandem interconnection on a limited basis, accepting Access Service Requests (ASRs) for interconnection at the local tandem for traffic delivered to

BellSouth end-users, where technically feasible. While BellSouth is not in a position to offer interconnection to all end users included in that local tandem homing arrangement (non-BellSouth end-users), BellSouth is aggressively working on the internal and external issues related to that situation, as well as the issue of technical feasibility.

The BFR process, designed to track, evaluate and provide a response to customers' requests for non-tariffed products and/or services that are not covered in the customers' Interconnection Agreement or Wireless Contract, can continue to be used for non-standard requests. The process adds flexibility for the CLEC to the extent that a given UNE was not contemplated during negotiation or just did not make it into the interconnection agreement. If a CLEC develops additional needs, the BFR provides a process for BellSouth to evaluate the request, and provide the service or product, if feasible; providing flexibility to the CLEC to amend its agreement as necessary as their business grows and needs change.

Q. Provide historical data on frequency of reconfiguring network that causes end offices subtended by local tandem to change.

A. BellSouth does not maintain specific data with which to respond to this question. However, in order to be as responsive as possible, BellSouth notes that adding, retiring or rehoming end offices changes the tandem configuration. Rehoming of end offices from one local tandem to another occurs very infrequently, perhaps once in every fifteen (15) years. BellSouth currently has plans to rehome several end-offices in the Atlanta local calling area. This, however, should no longer present problems since BellSouth now offers local tandem interconnection as a standard arrangement.

2-WAY TRUNKING

Q. In how many states do we offer 2-way trunking?

A. The method of providing two-way trunking discussed below is offered in all nine states in BellSouth's region.

Q. Clarify status of 2-way trunking request(requirement) in FL.

A. BellSouth made two-way trunking available to CLECs on March 31, 1997. The CLEC may choose to order two-way trunks for exchange of combined local and intraLATA toll traffic at the BellSouth end offices or access tandems. In cases where the CLEC is also an interexchange carrier (IC), the IC's Feature Group trunking must remain separate from the local interconnection trunking. Both companies will have to agree to the two-way trunking principles as described below.

To date, two-way trunking has been ordered by one CLEC, Continental Cable in Jacksonville, Florida. Since this arrangement was implemented as a trial prior to March 31, 1997, it was not done in accordance with BellSouth's current two-way trunking principles.

The so-called "SuperGroup" option allows for combining the original three individual trunk groups (transient, originating combined local and intraLATA, and terminating local/intraLATA) into one trunk group. BellSouth made this option available to CLECs on June 30, 1997. The SuperGroup may be ordered at the access tandem only and must be two-way. The principles for two-way trunking, referenced below, also address the SuperGroup. CLECs may combine their terminating local/intraLATA trunk group with their transient trunk group, which is the BellSouth preferred access tandem interconnection architecture option; but it is not a true SuperGroup as described here.

TWO -WAY TRUNKING PRINCIPLES

Under any of the existing interconnection architecture options, when BellSouth delivers traffic from BellSouth end users to the CLEC end users on a two-way trunk group that is ordered by the CLEC, the following "rules" apply and must be agreed upon by both companies:

1. CLEC will initiate two-way trunk request, and BellSouth will concur; however, two-way trunks will be jointly provisioned.

2. Point of Interconnection (POI) will be located at a mutually agreed location. If an agreement cannot be reached on the location of the POI, each company will establish its own one way trunk group.

BellSouth will be responsible for the installation and maintenance of its trunks and facilities to the mutually agreed POI and the CLEC will be responsible for the installation and maintenance of its trunks and facilities to the mutually agreed POI.

3. BellSouth and the CLEC will jointly review the trunk forecast, as needed, on a periodic basis, or at least every 6 months.

4. CLEC will order trunks using the Access Service Request (ASR) process in place for Local Interconnection after the joint planning meetings take place between BellSouth and the CLEC.

5. BellSouth and the CLEC must agree on standard traffic engineering parameters that will be used in the engineering of the trunk groups.

6. BellSouth's Circuit Capacity Management group will either contact the CLEC directly or through the CLEC Account Team whenever there is a need to add trunks to existing trunk groups or to arrange for a Forecast Review planning session.

7. Either BellSouth or the CLEC can request one-way trunk groups connection, even after two-way trunk groups are in place.

8. For technical reasons, two-way trunk groups may not be ordered to a BellSouth DMS100 local tandem or a DMS100 end office. The reason is that calls from PX trunk groups (i.e. cellular Type 1 and some PBXs) will automatically fail.

COLLOCATION

Q. Explain why we are not generally offering virtual collocation.

A. Virtual collocation is now offered as a standard arrangement through BellSouth's Statement of Generally Available Terms and Conditions, through BellSouth's FCC No. 1 tariff, Section 20, and can be included in a negotiated interconnection agreement. As part of its physical collocation offering, BellSouth voluntarily chose to allow switching equipment to be placed as part of the physical collocation arrangement. It is BellSouth's policy that switching cannot be placed in a virtual collocation arrangement. Where switching equipment is not involved as part of the collocator's request, or where no physical space is available, BellSouth offers virtual collocation to any requesting telecommunications service provider, including CLECs. BellSouth is currently offering and providing virtual collocation to CLECs. Some examples are ACSI, KMC, MGC, and Hyperion. An overview of the Virtual Collocation procedures is included in the BellSouth Collocation Handbook.

LOOPS

Q. What documentation have we given CLECs so they know trouble report will lead to loop being taken out?

A. The intrusive testing related to trouble reports is discussed in the periodic CLEC conferences with the attending CLECs. In addition, the CLEC Repair Handling Guide, which BellSouth provides to CLECs, refers to BellSouth's intrusive testing in the troubleshooting section for designed services. In addition, the "Operational Understanding" discussed below and at the CLEC conference with the attending CLECs, states that sending a trouble ticket to BellSouth, gives BellSouth permission to test. As discussed with the CLECs, the permission to test includes the possibility of taking down a live loop. Obviously, any facilities-based telecommunications provider is aware of this need because they have to take down facilities periodically to perform their own testing.

Q. What process is in place to let CLECs know when a network outage has occurred?

A. Notification is provided to CLECs upon trouble receipt by BellSouth repair centers when centers are aware of outage conditions and by the BellSouth Network Management Center if negotiated in the Operational Understanding as discussed above.

Any CLEC can negotiate the process for network outage notification by agreeing to an "Operational Understanding" between BellSouth and the CLEC. The Operational Understanding (OU) Center to Center Interface Agreement refers to outage notification in Section 6 and contains the following: "BellSouth will advise

CLEC of any central office failure that is known at the time of any inquiry or trouble report by CLEC to any BellSouth maintenance bureau".

Appendix C of the Operational Understanding refers to the Network Management Center (NMC) interface with CLECs for whom BellSouth performs network management functions. AT&T currently has negotiated such an agreement with the BellSouth Network Management Center.

The interconnection agreement between BellSouth and AT&T, Attachment 5, paragraph 3.1.7, provides one example of contract references to outage notification. These outage notifications were also discussed in the BellSouth CLEC conferences.

TRANSPORT

Q. Clarify data when mechanized billing for unbundled transport became available.

A. The mechanized billing for interoffice transport has been in production since September 25, 1997.

Q. Clarify date when BellSouth can deliver billing data CLEC needs to be able to bill its customer for interstate access.

A. BellSouth implemented the capability to mechanically provide the access records on December 19, 1997. Paper access was available from November, 1997 through the December implementation date.

Q. Respond to other AT&T argument re: inability to bill for access.

A. As stated above, BellSouth has the capability to provide the mechanized access records associated with the unbundled network elements. BellSouth requires contract provisions (either in the form of the new ADUF contract or as part of or an amendment to the existing interconnection agreement) before the Access Daily Usage File (ADUF) is provided to a CLEC.

Q. State the charges that apply for billing data provided on a daily basis.

A. ADUF charges will mirror Optional Daily Usage File charges, with the exception of the Recording Service. The ODUF rate for Recording Service is not applicable to these messages. It only applies to unbundled operator services messages. An example of the charges that apply, as approved by the Louisiana PSC, are as follows:

$0.0024 per message - Message Distribution
$0.00003 per message - Data Transmission

The CLEC can receive this data through Connect Direct Service and no charges beyond those applicable for the Connect Direct Service. If a CLEC chooses to receive this file via a magnetic tape, there is a $47.30 per tape charge.

Q. Compare the times required and functions to be changed when [1] a PIC change is requested, [2] switch using unbundled loop and port is ordered, and [3] switch "as-is" resale occurs.

A. FUNCTIONS

Order & Provision a PIC Change	Order & Provision and unbundled Switch Port + Loop	Order & Provision a resale "Switch-as-is"
1. Electronically submit CARE record, including Customer TN, Carrier Code, PIC/LPIC to be switched.	1. BellSouth will deliver port+loop in collocation space. BellSouth policy prohibits combinations of UNEs, such as port+loop. Port and loop may be ordered separately via electronically submitted LSRs into EDI or LENS.	1. Electronically submit Local service Request (LSR) via EDI or LENS.
2. Validate Record (Working TN, Valid carrier code, valid PIC, etc.	2. Validate LSRs for all LSR edits (up to 143 fields)	2. Validate LSR for all LSR edits (up to 143 fields)
	3. Translate LSRs to BellSouth Service Order Format	3. Translate LSR to BellSouth Service Order Format
	4. Validate Service Orders for Universal Service Order Codes (USOCs), valid Field Identifiers (FIDs), and valid required data	4. Validate Service Order for Universal Service Order Codes (USOCs), valid Field Identifiers (FIDs), and valid required data
	5. Acknowledge receipt of correct orders with Firm Order Confirmations	5. Acknowledge receipt of correct order with Firm Order Confirmation
3. Submit change to MARCH	6. Submit port order to MARCH and COSMOS for switch provisioning and cross connect provisioning	
4. MARCH provisions PIC change in specified BST switching system.	7. Submit loop order to design flow for assignment in FACS/LFACS or redesign if on an integrated subscriber carrier	

5. Receive fallout from MARCH and handle	8. Complete loop design	
	9. Submit loop order to FACS/LFACS for assignment	
	10. Cross connect loop facility to collocation space, cross connect port to collocation space	
6. Submit order to Customer billing System (CRIS)	11. Submit orders to Customer billing Systems (CRIS) and (CABS)	6. Submit order to Customer billing System (CRIS)
7. Confirm successful completion to carrier.	12. Electronically return completion notices to carrier.	7. Electronically return completion notice to carrier.

B. TIMES

Order & Provision a PIC Change	Order & Provision and unbundled Switch Port + Loop	Order & Provision a resale "Switch-as-is"
Order processing per order - 30 minutes after start of job.	Order processing per order - Residential: 43 mins. Small Bus.: 59 mins. Large Bus.: 79 mins. + 10 mins./each add'l line (usually complex)	Order processing per order - Residential: 43 mins. Small Bus.: 59 mins. Large Bus.: 79 mins + 10 mins./each add'l line (usually complex)
Provisioning - if order received by 3:00pm EST, worked the same day; if received after 3:00pm, worked the next business day.	Provisioning - port orders: 3 days (1-10), 4 days (11-25). Loop orders: 5 days (1-5), 7 days (6-14). ICB if more ordered in both cases.	Provisioning - if order received by 3:00pm EST, worked the same day; if received after 3:00pm, worked the next business day

ACRONYMS

MARCH - Memory Administration Recent Change
COSMOS - Computer System for Mainframe Operations
FACS/LFACS - Facility Assignment Control System/Loop FACS

NUMBER PORTABILITY

Q. What does calling party hear when called party's number has not been ported?

A. Presuming that the unbundled loop serving the called party has been removed from the BellSouth switch and reconnected to the CLEC's switch, the calling party will encounter "Ring-No Answer". In other words, the calling party will hear ringing tone and the call will not be answered by the called party. This situation cannot be remedied in the switch. To have the switch do anything differently requires the same activity that is required to perform the number porting. The number portability can be accomplished in the same time frame (or possibly quicker because of priorities) that the switch could be instructed to do anything differently.

Q. Document communications that inform CLEC that number porting and loop-cutover may not occur essentially simultaneously if CLEC requests cut-over during busy period for switch.

A. The processes related to coordination of loop cutovers with interim number portability were discussed extensively in the CLEC conferences which BellSouth held with the attending CLECs. No other documentation (apart from verbal discussions) has been provided to CLECs.

Q. Provide monthly reports submitted to NANC concerning LNP implementation.

A. BellSouth is not a member of NANC. Attached are the October - December, 1997 reports (Attachment 2) prepared by Southeast Limited Liability Company (LLC), of which BellSouth is a member, that contain BellSouth information.

In addition, BellSouth made *ex-partes* with the FCC on January 5 and January 16, 1998 concerning LNP implementation.

EXPENSE		1996	1997	1998	1999	2000
Network Expense						
Limited Liability Company Membership	CSOTH	$ 5,000	$ 20,000	$ 50,000	$ 25,000	$ 25,000
Limited Liability Company Insurance	CSOTH	$ -	$ 28,000	$ 30,000	$ 30,000	$ 30,000
N3P-SMS	CSOTH	$ -	$ -	$ 6,100,000	$ 6,100,000	$ 6,100,000
AIN-IBU	SAW	$ -	$ 1,281,300	$ 1,281,300	$ 1,031,300	$ -
Annual Tech. Support, H/W Warranty-LAB-VCHR	RTUOTH	$ -	$ -	$ 385,000	$ 385,000	$ -
Annual Tech. Support, H/W Warranty-Field-VCHR	RTUOTH	$ -	$ 72,000	$ 1,210,000	$ 1,540,000	$ -
SCP Documentation Release 8 & 9	OTH	$ -	$ -	$ 250,000	$ 150,000	$ -
Corporate Comm-Field SCP Pairs	OTH	$ -	$ 232,000	$ 174,000	$ -	$ -
AINSMS Software - Production System	RTUOTH	$ -	$ -	$ 116,600	$ 50,000	$ -
Calculated Expense Drag-Network Regional		$ -	$ -	$ 164,890	$ 10,000	
Network Infrastructure	SAW	$ -	$ 262,408	$ -	$ -	$ -
Network Operations	SAW	$ -	$ 183,216	$ -	$ -	$ -
New SCP Pairs - LABS	RTUSWT	$ -	$ 4,900,000	$ -	$ -	$ -
New SCP Pairs - LABS	RTUOTH	$ -	$ 45,800	$ -	$ -	$ -
SCP Upgrades - LABS	RTUSWT	$ -	$ 73,600	$ 3,404,200	$ -	$ -
SCP Upgrades - LABS	RTUOTH	$ -	$ 61,000	$ -	$ -	$ -
AIN-SMS Software - LABS	RTUOTH	$ -	$ -	$ 112,400	$ 50,000	$ -
Technical Support-LAB-TEO	RTUOTH	$ -	$ 72,000	$ -	$ -	$ -
Basic Lab Operation-Warranty + R9 Upgrade	RTUSWT	$ -	$ -	$ 495,000	$ -	$ -
1AESS RTU -LABS	RTUSWT	$ -	$ 133,000	$ -	$ -	$ -
AIN-S&T	SAW	$ -	$ 2,592,600	$ 4,421,500	$ 2,210,800	$ -
AIN - INSAC	SAW	$ -	$ 100,000	$ 200,000	$ 200,000	$ -
Network GEO Expense (w/o Opr. Svcs.)		$ -	$ 36,100,738	$ 56,258,789	$ 51,696,627	$ 480,584
Total Network Expense		**$ 5,000**	**$ 46,157,862**	**$ 74,683,679**	**$ 63,478,727**	**$ 6,636,584**
Systems Expense						
BellSouth Applied Technologies- Gateway	AFFOTH	$ 1,149,889	$ 5,837,100	$ 7,160,000	$ -	$ -
BellSouth Applied Technologies - TAFI	AFFOTH	$ -	$ 1,498,000	$ -	$ -	$ -
BellSouth Applied Technologies - LNP Automation	AFFOTH	$ -	$ 3,074,300	$ 4,950,000	$ 350,000	$ 350,000
Operational Support Systems	IT	$ 32,210	$ 24,543,412	$ 7,168,200	$ 3,934,348	$ -
IT Support - LNP Gateway	IT	$ -	$ 2,373,841	$ 2,103,914	$ 685,000	$ 425,000
IT Support - LNP TA Interfaces	IT	$ -	$ 280,000	$ 175,000	$ -	$ -
IT Support - LNP Automation	IT	$ -	$ 126,310	$ 1,093,516	$ 400,000	$ 400,000
Bellcore Projects	BCR	$ -	$ 75,000	$ 3,427,100	$ -	$ -
AMS - LNP TA GUI	IT	$ -	$ 227,376	$ -	$ -	$ -
Network Systems Support - Arts	SAW	$ -	$ -	$ 155,000	$ -	$ -
Network Systems Support -Cosmos/Atlas	SAW	$ -	$ -	$ 152,000	$ -	$ -
Network Systems Support -Total Network Mgmt.		$ -	$ -	$ 1,680,000	$ -	$ -
Network Systems Support - E911		$ -	$ -	$ 466,000		
TCN Gateway - Charlotte		$ -	$ 93,586.00	$ -	$ -	$ -
Operator Services	OPSYS	$ -	$ 790,000	$ 575,000	$ -	$ -
Total Systems Expense		**$ 1,182,109**	**$ 38,898,925**	**$ 29,105,730**	**$ 5,369,348**	**$ 1,175,000**

Attachment I

BellSouth Telecommunications, Inc.
Alabama Docket Number 25703

Exhibit Number WKM-11 _____

Table showing results of BellSouth's study of Line Class Code consumption as a result of selective routing

Switch type	BellSouth switches in Alabama exhausted based on LCC capacity with BellSouth plus one ALEC	BellSouth switches in Alabama exhausted based on LCC capacity with BellSouth plus three ALECs	BellSouth switches in Alabama exhausted based on LCC capacity with BellSouth plus five ALECs	BellSouth switches in Alabama exhausted based on LCC capacity with BellSouth plus eight ALECs
1AESS	100%	100%	100%	100%
5ESS	29%	43%	97%	100%
DMS-100 and DMS-100/200	32%	68%	100%	100%
TOTAL	40%	63%	99%	100%

Table showing the results of BellSouth's study of LCC consumption as a result of selective routing

Switch type	BellSouth switches in Florida exhausted based on LCC capacity with BellSouth plus one ALEC	BellSouth switches in Florida exhausted based on LCC capacity with BellSouth plus two ALECs	BellSouth switches in Florida exhausted based on LCC capacity with BellSouth plus five ALECs	BellSouth switches in Florida exhausted based on LCC capacity with BellSouth plus eight ALECs
1AESS	100%	100%	100%	100%
5ESS	11%	20%	68%	100%
DMS-100	30%	83%	100%	100%
TOTAL	24%	49%	82%	100%

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The table below shows the results of BellSouth's study. The percentages shown are the proportions of installed switches that are not capable of providing the selective routing requested.

Switch type	BellSouth switches in Georgia exhausted based on LCC capacity with BellSouth plus one ALEC	BellSouth switches in Georgia exhausted based on LCC capacity with BellSouth plus three ALECs	BellSouth switches in Georgia exhausted based on LCC capacity with BellSouth plus five ALECs	BellSouth switches in Georgia exhausted based on LCC capacity with BellSouth plus eight or more ALECs
1AESS	100%	100%	100%	100%
5ESS	11%	30%	78%	100%
2BESS	100%	100%	100%	100%
DMS-100	45%	82%	100%	100%
TOTAL	53%	72%	92%	100%

Table showing results of BellSouth's study of Line Class Code consumption as a result of selective routing.

NOTE: Assumes capacities of 4096 Line Class Codes in the 5ESS switches and 1024 Line Class Codes in the DMS-100 and DMS-100/200 switches.

Switch type	BellSouth switches in Kentucky exhausted based on LCC capacity with BellSouth plus one ALEC	BellSouth switches in Kentucky exhausted based on LCC capacity with BellSouth plus two ALECs	BellSouth switches in Kentucky exhausted based on LCC capacity with BellSouth plus five ALECs	BellSouth switches in Kentucky exhausted based on LCC capacity with BellSouth plus eight ALECs
1AESS	100%	100%	100%	100%
5ESS	47%	60%	100%	100%
DMS-100 and DMS-100/200	57%	80%	100%	100%
TOTAL	65%	76%	100%	100%

Table showing results of BellSouth's study of Line Class Code consumption as a result of selective routing

NOTE: Assumes capacities of 6000 Line Class Codes in the 5ESS switches and 2048 Line Class Codes in the DMS-100 and DMS-100/200 switches.

Switch type	BellSouth switches in Kentucky exhausted based on LCC capacity with BellSouth plus one ALEC	BellSouth switches in Kentucky exhausted based on LCC capacity with BellSouth plus two ALECs	BellSouth switches in Kentucky exhausted based on LCC capacity with BellSouth plus five ALECs	BellSouth switches in Kentucky exhausted based on LCC capacity with BellSouth plus eight ALECs
1AESS	100%	100%	100%	100%
5ESS	0%	47%	67%	100%
DMS-100 and DMS-100/200	33%	67%	80%	100%
TOTAL	32%	65%	78%	100%

Table showing results of BellSouth's study of Line Class Code consumption as a result of selective routing.

NOTE: Assumes a capacity of 4096 Line Class Codes in the 5ESS switches.

Switch type	BellSouth switches in Louisiana exhausted based on LCC capacity with BellSouth plus one ALEC	BellSouth switches in Louisiana exhausted based on LCC capacity with BellSouth plus two ALECs	BellSouth switches in Louisiana exhausted based on LCC capacity with BellSouth plus five ALECs	BellSouth switches in Louisiana exhausted based on LCC capacity with BellSouth plus eight ALECs
1AESS	100%	100%	100%	100%
5ESS	0%	38%	100%	100%
TOTAL	62%	74%	100%	100%

Table showing results of BellSouth's study of Line Class Code consumption as a result of selective routing

NOTE: Assumes a capacity of 6000 Line Class Codes in the 5ESS switches.

Switch type	BellSouth switches in Louisiana exhausted based on LCC capacity with BellSouth plus one ALEC	BellSouth switches in Louisiana exhausted based on LCC capacity with BellSouth plus two ALECs	BellSouth switches in Louisiana exhausted based on LCC capacity with BellSouth plus five ALECs	BellSouth switches in Louisiana exhausted based on LCC capacity with BellSouth plus eight ALECs
1AESS	100%	100%	100%	100%
5ESS	0%	38%	93%	100%
TOTAL	38%	62%	96%	100%

Table showing results of BellSouth's study of Line Class Code consumption as a result of selective routing.

NOTE: Assumes capacities of 4096 Line Class Codes in the 5ESS switches and 1024 Line Class Codes in the DMS-100 and DMS-100/200 switches.

Switch type	BellSouth switches in Mississippi exhausted based on LCC capacity with BellSouth plus one ALEC	BellSouth switches in Mississippi exhausted based on LCC capacity with BellSouth plus two ALECs	BellSouth switches in Mississippi exhausted based on LCC capacity with BellSouth plus five ALECs	BellSouth switches in Mississippi exhausted based on LCC capacity with BellSouth plus eight ALECs
1AESS	100%	100%	100%	100%
5ESS	36%	50%	91%	100%
DMS-100 and DMS-100/200	25%	75%	100%	100%
TOTAL	41%	59%	93%	100%

Table showing results of BellSouth's study of Line Class Code consumption as a result of selective routing

NOTE: Assumes capacities of 6000 Line Class Codes in the 5ESS switches and 2048 Line Class Codes in the DMS-100 and DMS-100/200 switches.

Switch type	BellSouth switches in Mississippi exhausted based on LCC capacity with BellSouth plus one ALEC	BellSouth switches in Mississippi exhausted based on LCC capacity with BellSouth plus two ALECs	BellSouth switches in Mississippi exhausted based on LCC capacity with BellSouth plus five ALECs	BellSouth switches in Mississippi exhausted based on LCC capacity with BellSouth plus eight ALECs
1AESS	100%	100%	100%	100%
5ESS	0%	41%	68%	91%
DMS-100 and DMS-100/200	0%	25%	75%	100%
TOTAL	10%	45%	72%	93%